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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

ALLSTATE INSURANCE COMPANY, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
CAROLINE PROSSER, )  
 )  
Defendant. )

Case No. A05-060-CI (JWS)

**STIPULATION TO EXTEND DEADLINE FOR CLOSE OF DISCOVERY**

COMES NOW plaintiff Allstate Insurance Company and defendant Caroline Prosser, by and through their respective undersigned counsel, and, pursuant to the court's Scheduling and Planning Order dated April 29, 2006, hereby stipulate to a two-month extension of the discovery deadline set forth in that Order. Discovery currently is set to be completed by October 16, 2006. The parties stipulate to extend that deadline to December 15, 2006.

Pursuant to numbered paragraph 7 of the Discovery section of the

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Order, the parties state that additional time is necessary to complete the deposition of the defendant, Ms. Prosser. Ms. Prosser was examined in July by plaintiff's expert neuropsychologist, and since that examination has scheduled additional medical evaluation. Counsel for plaintiff wishes to take Ms. Prosser's deposition after she has completed that additional evaluation. The parties anticipate that the deposition can be completed in late November or early December. Additionally, defense counsel may wish to depose plaintiff's expert; that deposition also would occur after Ms. Prosser has completed her additional medical evaluation, in late November or early December.

Accordingly, the parties request that the court approve this stipulated extension of the discovery deadline, through and including December 15, 2006.

CALL, HANSON & KELL, P.C.,  
Attorneys for plaintiff Allstate

DATED: 10/12/06

By: /S/  
Barry J. Kell  
Ak Bar No. 8611120

CHOQUETTE & FARLEIGH, LLC,  
Attorneys for defendant Prosser

DATED: 10/12/06

By: /S/  
William L. Choquette  
Ak Bar No. 7410066

**CERTIFICATE OF SERVICE**

I certify that on this the 12th  
day of October, 2006, a true  
and correct copy of the foregoing  
document, and attachments if  
any, were served upon the  
following counsel of record by  
mail:

William L. Choquette, Esq.  
Choquette & Farleigh, LLC  
629 L Street, Suite 101  
Anchorage, Alaska 99501

By: \_\_\_\_\_

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*Allstate v. Prosser*

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Stipulation to Extend Deadline for Close of Discovery

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